

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

OLIVIA Y., *et al.*

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, *et al.*

DEFENDANTS

**AGREED MOTION FOR CONSENT ORDER EXTENDING TIME TO FILE THE
YEAR TWO IMPLEMENTATION PLAN**

Pursuant to the Consent Order signed by this Court on January 1, 2009, the parties, along with the Council on Accreditation (“COA”), were to jointly develop a Year Two Implementation Plan as required by paragraph I.B. of the Mississippi Settlement Agreement and Reform Plan, by April 1, 2009. The parties and COA are actively negotiating in good faith to reach agreement, yet require additional time to develop the Year Two Implementation Plan. The parties respectfully request the entry of the enclosed Consent Order regarding the date by which the parties shall file the Year Two Implementation Plan.

Pursuant to the proposed Consent Order, the Year Two Implementation Plan shall be filed by May 1, 2009.

Respectfully submitted, this 27th day of March, 2009.

/s/ Shirim Nothenberg

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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2009, I electronically filed the foregoing Agreed Motion for Consent Order Extending Time to File Second Year Implementation Plan with the Court using the ECF system, which sent notification of such filing to the following:

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